

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Miri Monique Mozuch-Stafford,

Plaintiff,

Case No. 22-cv-02250

PAM/DLM

vs.

Ramsey County, Thomas Kunkel, in Individual and Official Capacities, Lauren Arnevik, in Individual and Official Capacities, Olivia Rezac, in Individual and Official Capacities, Domonik Stanton, in Individual and Official Capacities, Melissa Hildebrandt, in Individual and Official Capacities, Mohamud Salad, in Individual and Official Capacities, Michele Van Vranken, in Individual and Official Capacities,

Defendants.

**STIPULATION OF
DISMISSAL WITH
PREJUDICE OF
DEFENDANT RAMSEY
COUNTY AND REQUEST
FOR APPROVAL OF
SETTLEMENT
PURSUANT TO MINN.
STAT. § 466.08**

WHEREAS, Plaintiff Miri Monique Mozuch-Stafford commenced the above-referenced action alleging that Defendant Ramsey County and the above-named Defendants were liable to Plaintiff for injuries Plaintiff allegedly sustained while in the custody of Ramsey County; and

WHEREAS, Plaintiff and Ramsey County, through their respective legal counsel, have negotiated an amicable resolution; and

WHEREAS, Plaintiff and Ramsey County's negotiated settlement involves a payment to the Plaintiff and her attorneys of more than ten thousand dollars; and

WHEREAS, Minnesota Statute, § 466.08 (2022) provides:

Notwithstanding sections 466.03 and 466.06, the governing body of any municipality, the administrator of a self-insurance pool, or the authorized representative of a private insurance carrier may compromise, adjust and settle tort claims against the municipality for damages under section 466.02 and may, subject to procedural requirements imposed by law or charter, appropriate money for the payment of amounts agreed

upon. When the amount of a settlement exceeds \$10,000, the settlement shall not be effective until approved by the district court.

NOW THEREFORE, Defendant Ramsey County and Plaintiff, through their attorneys of record, hereby stipulate, agree, and request that the Court enter an order: (1) approving the settlement; and (2) dismissing Plaintiff's claims against Defendant Ramsey County with prejudice and without costs, disbursements, or attorneys' fees to any party.

MESHBESHER & ASSOCIATES, P.A.

Dated: 6/15/2023

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Attorneys for Plaintiff

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RAMSEY COUNTY ATTORNEY

Dated: 6/15/2023

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